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November 27, 2024

**Via ECF**

Hon. Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, N.Y. 10007

**MEMO ENDORSED**

Re: Azor-El v NYC Dep't of Correction, 20-cv-3650 (KPF),  
Request for Adjournment of Submission of Status Letter

Dear Judge Failla:

Jointly on behalf of the parties, we write to respectfully request a two-week adjournment of the status letter presently due November 29, 2024, to December 13, 2024.

The purpose of the letter was to advise the Court of the next steps in this litigation, following the Court's decision certifying various classes. We have had discussions on the next phase, especially whether to provide notice now to the class of the certification, as well as further expert disclosure, and whether any remaining factual discovery is necessary. Presently, we are awaiting information from the IT departments of the Department of Correction and Health and Hospitals Corporation that will enable us to provide a timeline for the potential notice, as well as an approximate number of class members, so the parties may estimate the cost of such notice. This is the first request for an adjournment of the submission date of the status letter, and it does not affect any other scheduled dates. As noted, Plaintiffs' counsel has joined in this request.

Respectfully yours,



Chlarens Orsland  
David Thayer  
Assistant Corporation Counsel

CC: Keenan and Bhatia  
Counsel for Plaintiffs  
*Via ECF*

Application GRANTED. The deadline for the parties to submit a joint status update to the Court is hereby ADJOURNED *nunc pro tunc* to **December 13, 2024**.

The Clerk of Court is directed to terminate the pending motion at docket entry 211.

Dated: December 2, 2024 SO ORDERED.  
New York, New York



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE